

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY, AARON WOLKIND, STEVE HARTLEY, RICHARD SCHWETZ, JOBEL BARBOSA, MATTHEW REIDINGER, JOHN HUGO, SEAN-MICHAEL DAVID SCOTT, THOMAS LOUDEN, ZACHARY REHL, AMANDA REHL, K.R., a minor, by and through her father ZACHARY REHL, and her mother AMANDA REHL, MARK ANTHONY TUCCI,

Plaintiffs,
vs.

CHRISTIAN EXOO a/k/a ANTIFASH GORDON, ST. LAWRENCE UNIVERSITY, TRIBUNE PUBLISHING COMPANY, NEW YORK DAILY NEWS, VIJAYA GADDE, TWITTER, INC., COHEN, WEISS AND SIMON, LLP, NICK STRICKLAND, TORCH ANTIFA NETWORK, UNNAMED ASSOCIATES 1-100

Defendants.

CIVIL ACTION
NO.: 2:20-cv-
12880-
JMV-JSA

Hon. John M.
Vazquez, U.S.D.J.

[PROPOSED] ORDER

UPON CONSIDERATION of Defendant Exoo's Motion for Sanctions

Pursuant to Fed. R. Civ. P. 11 against Patrick Traynor, Esq., Counsel for Plaintiffs any response(s) thereto, and the record herein, it is on this ____ day of _____, 2022:

ORDERED, that Defendant Exoo's motion against Plaintiffs for violations of Fed. R. Civ. P. 11(c) is GRANTED, and it is further;

ORDERED, that Plaintiff's Counsel Patrick Trainor, Esq. shall pay to The Marlborough Law Firm, P.C., and Richard Torres, Esq., reasonable attorneys' fees, costs, and expenses incurred in responding to the unauthorized addition of a new claim and new parties, in connection with the instant motion, Defendant Exoo's motion to strike and motion to dismiss; and it is further;

ORDERED, that Counsel for Defendant Exoo shall submit to the Court within thirty (30) days of the date of this order an affidavit of services in support of the award for attorneys' fees, costs, and expenses;

ORDERED, that Patrick Trainor, Esq. is admonished to cease filing frivolous pleadings in this action;

ORDERED, that a copy of this Order be served upon all counsel of record within ____ days.

HONORABLE JUDGE JOHN M. VAZQUEZ
DISTRICT JUDGE FOR THE DISTRICT OF
NEW JERSY